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20 MountainView Hospital; and Southern Hills
21 Medical Center, LLC d/b/a Southern Hills
22 Hospital & Medical Center
23

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 SUNRISE MOUNTAINVIEW HOSPITAL, INC.
16 D/B/A MOUNTAINVIEW HOSPITAL; and
17 SOUTHERN HILLS MEDICAL CENTER, LLC
18 D/B/A SOUTHERN HILLS HOSPITAL &
19 MEDICAL CENTER,
20

Plaintiffs,

21 vs.
22

23 BLUE CROSS BLUE SHIELD HEALTHCARE
24 PLAN OF GEORGIA, INC.,
25

Defendant.

Case No.: 2:23-cv-00992-MMD-BNW

26 **PLAINTIFFS SUNRISE
27 MOUNTAINVIEW HOSPITAL, INC. AND
28 SOUTHERN HILLS MEDICAL CENTER,
LLC'S UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

29 Pursuant to LR IA 6-1 and 6-2, Plaintiffs, Sunrise MountainView Hospital, Inc. d/b/a
30 MountainView Hospital ("MountainView Hospital"), and Southern Hills Medical Center, LLC
31 d/b/a Southern Hills Hospital & Medical Center ("Southern Hills Hospital"), (collectively
32 "Plaintiffs"), by and through their counsel, Bailey♦Kennedy, respectfully move this Court for
33 an extension of time to and including Friday, September 15, 2023, to file their Response to
34

1 Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.'s ("Defendant") Motion to
2 Dismiss Plaintiffs' Complaint. In support of this request, Plaintiffs offer the following:

3 On August 23, 2023, Defendant filed its Motion to Dismiss [Dkt. No. 17]. Pursuant to
4 Local Rule 7-2(b), Plaintiffs' response is currently due on September 6, 2023.

5 Due to the time associated with drafting a response to Defendant's Motion to Dismiss
6 and reviewing the voluminous documents that Defendant attached to such motion, and due to
7 the schedule of Plaintiffs' counsel, Plaintiffs need additional time to prepare their response.

8 Plaintiffs therefore respectfully request an extension of time to and including Friday,
9 September 15, 2023, to file their Response to Defendant's Motion to Dismiss. This is the first
10 motion to extend time to respond to the Motion to Dismiss Plaintiffs' Complaint.

11 Plaintiffs' request is made in good faith and no party will be prejudiced by the granting
12 of this Motion. Indeed, counsel for Defendant has advised that Defendant does not oppose the
13 relief requested herein.

14 Additionally, the granting of this Motion will not delay the proceeding as the parties
15 are still actively engaged in drafting discovery requests and moving this case forward.

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Consequently, Plaintiffs respectfully suggest that their request for an extension of time to and including Friday, September 15, 2023, to file its Response to Defendant's Motion to Dismiss [Dkt. No. 17, filed August 23, 2023], should be granted.

DATED this 30th day of August, 2023.

BAILEY♦KENNEDY

By: /s/ Joshua M. Dickey
JOSHUA M. DICKEY

In Association With:

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d/b/a MountainView Hospital; and
Southern Hills Medical Center, LLC
d/b/a Southern Hills Hospital &
Medical Center*

IT IS SO ORDRED:

UNITED STATES DISTRICT COURT JUDGE

DATED: August 30, 2023

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY♦KENNEDY and that on the 30th day of August, 2023, service of the foregoing **PLAINTIFFS SUNRISE MOUNTAINVIEW HOSPITAL, INC.**

**AND SOUTHERN HILLS MEDICAL CENTER, LLC'S UNOPPOSED MOTION FOR
EXTENSION OF TIME (FIRST REQUEST)** was made by mandatory electronic service through
the United States District Court's electronic filing system and/or by depositing a true and correct
copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known
address:

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